

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

-----  
**CATHERINE ORCUTT,**  
**Plaintiff,**

**vs.**

**No. 2:15-cv-2474-JCM-PAL**

**CAROLYN W. COLVIN, ACTING  
COMMISSIONER OF SOCIAL SECURITY,  
Defendant.**  
-----

**MOTION TO EXTEND TIME TO FILE MOTIONS**  
**(First Request)**

The undersigned respectfully requests a thirty day (30-day) extension of time on the current briefing schedule, which is as follows:

Plaintiff shall file a motion to remand in this court based on new medical evidence no later than 5/13/16. Defendant has until 6/13/16 to file either a notice of voluntary remand or opposition to Plaintiff's motion. Plaintiff may file a reply by 7/5/16. Plaintiff may file a motion for reversal or remand by 5/13/16. Defendant's cross motion to affirm may be filed no later than 6/13/16.

The reason for the extension is the unexpected illness of the attorney responsible for drafting Plaintiff's brief, requiring an extension of time in order to properly prepare Plaintiff's Motion for Reversal or Remand and supporting memorandum. Counsel for the Defendant consents to this request. In light of the foregoing, the undersigned requests that the court grant this stipulation and amended scheduling order in this matter.

Respectfully submitted,

/s/Howard Olinsky, Esq.

Howard Olinsky, Esq.

*Pro Hac Vice*

300 South State Street, Suite 420

Syracuse, NY 13202

Phone: (863) 648-2958

Email: fedct@windisability.com



**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

-----  
**CATHERINE ORCUTT,**  
**Plaintiff,**

**vs.**

**No. 2:15-cv-2474-JCM-PAL**


**CAROLYN W. COLVIN, ACTING  
COMMISSIONER OF SOCIAL SECURITY,  
Defendant.**  
-----

**[PROPOSED] ORDER**

Upon consideration of the Stipulation to Extend Time to File motions, and for good cause shown, it is ORDERED that the deadlines previously articulated in Dkt No. 13 are adjusted as follows:

Plaintiff shall file a motion to remand in this court based on new medical evidence no later than **6/13/16**. Defendant has until **7/13/16** to file either a notice of voluntary remand or opposition to Plaintiff's motion. Plaintiff may file a reply by **8/5/16**. Plaintiff may file a motion for reversal or remand by **6/13/16**. Defendant's cross motion to affirm may be filed no later than **7/13/16**.

SO ORDERED, this 17th day of May, 2016.

  
Hon. Peggy A. Leen  
United States Magistrate Judge

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

-----  
**CATHERINE ORCUTT,**

**Plaintiff,**

**vs.**

**No. 2:15-cv-2474-JCM-PAL**

**CAROLYN W. COLVIN, ACTING**

**COMMISSIONER OF SOCIAL SECURITY,  
Defendant.**

-----  
**CERTIFICATE OF SERVICE**

This is to certify that I have this day served counsel for the Defendant with Plaintiff's Motion for Extension of Time and Amended Scheduling Order by electronically filing the foregoing with the Clerk of the Court by using the CM/ECF system which will send electronic notification of such filing to:

Asim H. Modi, Esq.  
Special Assistant United States Attorney  
E-Mail: Asim.Modi@ssa.gov

This 12<sup>th</sup> day of May, 2016

/s/Howard Olinsky, Esq.

Howard Olinsky, Esq.

*Pro Hac Vice*

300 South State Street, Suite 420

Syracuse, NY 13202

Phone: (863) 648-2958

Email: fedct@windisability.com